



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK:ADG
F. #2018R01073

271 Cadman Plaza East
Brooklyn, New York 11201

November 26, 2019

By Email and ECF

Kannan Sundaram, Esq.
Federal Defenders of New York
One Pierrepont Plaza
Brooklyn, NY 11201

Re: United States v. Frank Segui
Criminal Docket No. 19-188 (KAM)

Dear Mr. Sundaram:

The government makes the following expert disclosure pursuant to Rule 16(a)(1)(F) and (G) of the Federal Rules of Criminal Procedure.

At trial, the government expects to call as an expert witness Vincent Radice, a Special Agent and a digital forensic examiner with the Federal Bureau of Investigation ("FBI"). Special Agent Radice is expected to testify that he made a forensic image of the defendant's computer, which is an exact copy of the computer's hard drive. He is also expected to testify about the imaging of data on the computer and that excerpts from the image are true and accurate copies from the forensic image of the defendant's computer.

In connection with Special Agent Radice's anticipated testimony, please find the following enclosed materials:

Description	Bates Numbers
Special Agent Radice's Curriculum Vitae	RADICE_001 - RADICE_002

Also in connection with the testimony, the government previously produced to you in discovery under cover of letter dated June 10, 2019, a forensic image of the defendant's laptop searched by the FBI, Bates-stamped FSEGUI000003. Additionally disclosed to you on that date was, as referenced above, a report pertaining to items seized

from the forensic image, Bates-stamped FSEGUI000006-000015, and a folder containing the items themselves, Bates-stamped FSEGUI000016.

As previously stated, including in the aforementioned discovery letter, you may examine the physical evidence discoverable under Rule 16, including the defendant's laptop, by calling me to arrange a mutually agreeable time.

The government continues to reserve its right to call substitute expert witnesses, as well as to call additional expert witnesses, and will provide advance notice of any intention to do so. In addition, the government requests reciprocal discovery from the defendant pursuant to Rule 16(b)(1)(A), (B) and (C).

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Andrew D. Grubin
Andrew D. Grubin
Assistant U.S. Attorney
(718) 254-6322

Enclosure

cc: Clerk of Court (KAM) (by ECF) (without enclosure)